

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MANUEL DE JESUS ROSARIO,	:	
	:	
Plaintiff,	:	CIVIL ACTION NO. 15-CV-6049 (JSR)
	:	
-against-	:	
	:	
MIS HIJOS DELI CORP., PALMA GROCERY	:	
CORP., 251 E. 123RD ST. REALTY, LLC,	:	
JOSE PALMA, LEONIDA COLLADO, and	:	
JUNIOR PALMA,	:	
Defendants.	:	

PLAINTIFF'S NOTICE OF MOTION FOR CONTEMPT

PLEASE TAKE NOTICE, that Plaintiff, by his attorneys, Ross & Asmar LLC, 499 Seventh Avenue, 23rd floor, New York, New York 10018, moves this Court at a time and date to be set by the Court for an Order pursuant to 18 U.S.C. § 401 and the Court's inherent authority finding defendants 251 E. 123rd St. Realty, LLC, Jose Palma, and Jose Palma Junior s/h/a Junior Palma in contempt of the Court's March 12, 2020 Order [Document 166], granting Plaintiff limited discovery of defendants' communications with counsel to determine the extent of counsel's knowledge of and involvement in the transfer of the real property located at 251 E. 123rd Street, New York, NY 10035, granting Plaintiff his costs and reasonable attorney's fees for this motion and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
September 14, 2020

Respectfully submitted,
ROSS & ASMAR LLC



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